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June 9, 2009

Via Certified Mail – Return Receipt Requested

The Debtors
GENERAL MOTORS CORPORATION
Cadillac Building
30009 Van Dyke Avenue
Warren, MI 48090-9025
Attn: Warren Command Center
Mail Code 480-206-114

WEIL, GOTSHAL & MANGES, LLP
767 Fifth Avenue
New York, NY 10153
Attn: Nathan M. Pierce, Esquire

Re: Demand for Reclamation of Satterlund Supply Company

To Whom It May Concern:

Our client, Satterlund Supply Company (“Satterlund”) is aware that General Motors Corporation (“GM”), along with its related entities (collectively, the “Debtors”), each filed a voluntary petition for relief under title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (Manhattan) (the “Bankruptcy Court”) on June 1, 2009. Satterlund has shipped certain Goods (defined below) to one or more of the Debtors and the Debtors took possession of such Goods prior to the commencement of their bankruptcy proceedings.

The Debtor receiving such goods was General Motors Detroit-Hamtramck Assy Center, 2500 East General Motors Blvd, Non-Product Receiving Gate C5, Detroit, MI 48211 on May 8, 2009, under Purchase Order GM DTS 03817. The value of the goods GM received is at least \$2,590.11. The products included two #1 Marpac Ball Valves, SSE 790, TTP 01 and two Essex Industries SA 0001x Dead man Handle Assemblies.

Section 2-702 of the Uniform Commercial Code states that where a seller discovers that a buyer received goods on credit while insolvent, the seller may reclaim the goods upon written demand made within 10 days of receipt of the goods by buyer. Section 546(c) of the Bankruptcy Code extends the look-back period to 45 days. In addition, a demand for reclamation may be made within 20 days of the commencement of a buyer’s bankruptcy case if the 45-day period expires after the commencement of such buyer’s bankruptcy case.

STARK REAGAN

PAGE 2

Pursuant to the above-referenced status, demand is hereby made by Satterlund for the return of the goods listed on the invoices referenced on Exhibit A attached hereto and incorporated by reference herein, and any other goods that are not listed on Exhibit A, but were received in the 45 days preceding the initiation of the Debtors' bankruptcy proceedings (collectively, the "Goods").

Based upon information currently available to us, we believe that the Debtors received the Goods on credit while insolvent within the 45 days preceding the commencement of the Debtors' bankruptcy proceedings, and as of the date of this letter, no part of the purchase price has been paid for such Goods. Accordingly, Satterlund hereby demands that all of the Goods be returned to it immediately pursuant to this reclamation demand. In addition, Satterlund further demands that the Goods be immediately segregated for return to Satterlund. Satterlund expressly prohibits any of the Debtors from further consuming any of the Goods or making any further sales of the Goods to others. The Goods shall be held in trust for Satterlund pending their return.

Moreover, Satterlund is making a demand for payment of the value of any Goods received by the Debtors during the 20 days preceding the commencement of the Debtors' bankruptcy cases. Section 503(b)(9) of the Bankruptcy Code grants an administrative claim to sellers of goods received by a debtor in the ordinary course of business 20 days prior to the filing of a debtor's bankruptcy petition.

Finally, GM and its related entities may have made representations of solvency to Satterlund within three months before delivery of the Goods thereby entitling Satterlund to additional reclamation rights under Applicable law. Satterlund expressly retains any and all such additional rights of reclamation.

Please promptly confirm that the Debtors will honor Satterlund's reclamation demand and payment demand for the Goods.

Very truly yours,

STARK REAGAN



By: J. Christopher Caldwell
Its: Attorney

cc: Mr. Frederick P. Satterlund
Michael H. Whiting, Esq.
Brian Shoichi Masumoto, Office of the U.S. Trustee
Joseph R. Sgroi, Esquire
Stephen Karotkin, Esquire

INVOICE

Satterlund SUPPLY COMPANY
 Specializing in Products for the Piping Industry



INVOICE NO.
213183
INVOICE DATE
05-08-09

26277 Sherwood Ave. • Warren, MI 48091
 (586) 755-9700 • FAX (586) 755-9713

SOLD TO GM NAO DISBURSEMENTS CENTER
 P.O. BOX 2000
 FLINT, MI 48501-2000

SHIP TO DETROIT-HAMTRAMCK ASSY CTR
 2500 E. GENERAL MOTORS BLVD
 NON-PRODUCT RECEIVING GATE C5
 DETROIT MI 48211-2002

CUSTOMER	SHIP VIA	DATE SHIPPED	SSC ORDER NO.	SLSM	CUSTOMER PURCHASE ORDER	PAGE	
341	DOT RYA/GS	05-08-09	166629	DW	DTS 03817	1	
EOB	ORDER DATE	TAX	AREA	TERMS	ORDERED BY		
SHIPPING PT	02-05-09	Y	19	NET 10TH PROX	ROB BARNES		
QTY. ORD.	QTY. SHPD.	QTY. B/O	PART NO. / DESCRIPTION	U / M	UNIT PRICE	DISC. %	NET AMOUNT
2	2	0	999990 1 MARPAC BALL VALVE SSE 790 TTP 01-Z W/ DEAD MAN HANDLE ASSEMBLY SA0001X INSTALLED	EA	1.292.00		2.584.00

We hereby certify that these goods were produced in compliance with all applicable requirements of Section 6, 7 and 12 of the Fair Labor Standards Act, as amended, and of regulations and orders of the United States Department of Labor issued under Sec. 14 thereof.

GROSS AMOUNT	TAX	FREIGHT	MISC.	TOTAL INVOICE
2.584.00		6.15		2.590.15

SEE REVERSE SIDE FOR ADDITIONAL TERMS & CONDITIONS

ORIGINAL INVOICE

Satterlund

SUPPLY COMPANY

Specializing in Products for the Piping Industry

Date: 5-8-09

Driver: Ray

Satterlund	Customer	No. of	Recipient	Print Name
Sales Order No.	Name	Boxes/Pipe	Signature	Of Recipient
166629	Q.M. Det. HAM.	1	Don Collis	D. COLLINS

SATTERRLUND SUPPLY COMPANY
26277 SHERWOOD AVENUE
WARREN, MI 48091
(586) 755-9700 FAX (586) 755-9713

Q14865 01-29-09 1

341

GM MAG DISBURSEMENTS CENTER
P.O. BOX 2000
FLINT, MI 48501-2000

DETROIT-HAMTRAMCK ASSY CTR
2500 E. GENERAL MOTORS BLVD
NON-PRODUCT RECEIVING GATE C5
DETROIT, MI 48211-2002

ROB BARNES

01-29-09 NET 10TH PROX

19 DAN WRIGHT

1 900010	EA	2	525.0000	1,050.00
1 MARPAC BALL VALVE				
SSE 790 TTP 01				
2 999990	EA	2	767.0000	1,534.00
ESSEX INDUSTRIES SA0001X				
DEAD MAN HANDLE ASSEMBLY				
INSTALLED ON ABOVE VALVE				
3 COMMENTS	EA	1	0.0000	0.00
SPECIAL COMMENTS				
PRICES INCLUDE ALL FREIGHT				
CHARGES. LEAD TIME IS ABOUT				
7 - 8 WEEKS ARO TO DELIVERED.				

Subtotal

2,584.00

2,584.00

Satterlund

SUPPLY COMPANY

Specializing in Products for the Piping Industry

26277 Sherwood Ave. • Warren, Michigan 48091 • (586) 755-9700 • FAX (586) 755-9713

www.satterlund.com

E-mail: sattpvf@aol.com

Rob

pot

6m

DTS 03817

2 pcs

Marpac Valve

Essex Industries

7700 Gravois Rd.

St. Louis, Mo 63123

166629

Inv. Value. 39531

Essex 39532

Robert Barnes @

GM.COM

Dan

FEB 05 2009

Stainless, Carbon, Copper, PVC and CPVC Materials in Stock